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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 WILMINGTON TRUST, NATIONAL  
28 ASSOCIATION, AS SUCCESSOR  
29 TRUSTEE TO CITIBANK, N.A., AS  
30 TRUSTEE FOR STRUCTURED ASSET  
31 MORTGAGE INVESTMENTS II TRUST  
32 2007-AR6, MORTGAGE PASS-THROUGH  
33 CERTIFIES SERIES 2007-AR5,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,  
37 INC., et al.,

38 Defendants.

Case No.: 2:21-cv-00406-JAD-VCF

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO RENEWED MOTION FOR  
REMAND [ECF No. 17]**

**(First Request)**

ECF No. 20



Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Wilmington Trust, National Association (“Wilmington Trust”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On March 10, 2021, Wilmington Trust filed its Complaint in the Eighth Judicial District Court, Case No. A-21-830897-C [ECF No. 1-1];
2. On March 10, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On April 9, 2021, Wilmington Trust filed a Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8];
4. On April 22, 2021, the Court entered an order, pursuant to the Parties’ stipulation, staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the “*Wells Fargo II Appeal*”). Upon entry of the stay the Court denied as moot, all pending motions, including the Motion for Remand. The Court further ordered that the Parties move to lift the stay and reactivate any previously filed motions within 30 days of the issuance of the mandate in the *Wells Fargo II Appeal* [ECF No. 19];
5. On December 29, 2021, Wilmington Trust filed a Renewed Motion for Remand;
6. Chicago Title’s deadline to respond to Wilmington Trust’s Renewed Motion for Remand is currently January 12, 2022;
7. Chicago Title’s counsel is requesting an extension until February 3, 2022, to file its response to the pending Renewed Motion for Remand;
8. Chicago Title requests a brief extension of time to respond to the Motion for Remand to afford Chicago Title additional time to respond to the legal arguments set forth in Wilmington Trust’s motions;
9. Wilmington Trust does not oppose the requested extension;
10. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wilmington Trust's  
2 Motion for Remand [ECF No. 17] is hereby extended through and including February 3, 2022.

3  
4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

5  
6 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
7 Attorneys for Defendant CHICAGO TITLE  
8 INSURANCE COMPANY

9 Dated: January 10, 2022

SINCLAIR BRAUN LLP

10 By: /s/-Kevin S. Sinclair  
11 KEVIN S. SINCLAIR  
12 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

13 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Lindsay D. Dragon  
15 LINDSAY D. DRAGON  
16 Attorneys for Plaintiff WILMINGTON  
TRUST, NATIONAL ASSOCIATION

17 **IT IS SO ORDERED:**

18  
19 Dated: 1-10-2022

20 By:   
UNITED STATES DISTRICT COURT JUDGE